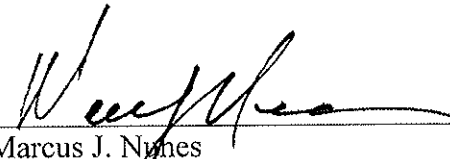




**CERTIFICATE OF SERVICE**

I, Marcus J. Nunes, an attorney, hereby certify that a copy of the foregoing **Motion for Enforcement of Settlement and Entry of Judgment** was served upon the named parties at the addresses below by depositing the same in the U.S. Mail with proper first class postage prepaid before 4:00 p.m. on September 21, 2010.

Howard Emmerman  
161 North Clark Street, Suite 2600  
Chicago, Illinois 60601  
Telephone: (312) 621-9700  
Facsimile: (312) 621-0909  
Email: hemmerman@beermannlaw.com

By:   
\_\_\_\_\_  
Marcus J. Nunes  
One of Their Attorneys

Marcus J. Nunes  
Chico & Nunes, P.C.  
333 West Wacker Drive, Suite 1800  
Chicago, Illinois 60606  
Telephone: (312) 463-1000  
Facsimile: (312) 463-1001  
Firm ID # 40897



Attached as Exhibit 2 is a true and accurate copy of the Notice to Cure and is incorporated herein.

5. More than ten days have elapsed from the date of the notice and Mann has failed to cure its default under the Settlement Agreement.

6. Under the terms of the Settlement Agreement, Mann's failure to cure (10 days from the date of the notice) triggers Mann's admission and confession of judgment in favor of Chico & Nunes in the total amount due, \$130,666.42 (less any payments already made).

7. On or about June 2, 2010, Mann made its initial payment of \$15,000 under the Settlement Agreement leaving a balance of \$115,666.42.

8. Chico & Nunes has performed all conditions required of it under the Settlement Agreement.

9. Pursuant to the Settlement Agreement, Chico & Nunes has the right to immediately obtain from this Honorable Court an Order of Judgment against Mann and in its favor in the amount of \$115,666.42, which judgment shall accrue post judgment interest at the applicable rate from the date of its entry.

WHEREFORE, Defendant Chico & Nunes, P.C., requests as follows:

A. Enter judgment in favor of Defendant Chico & Nunes and against Plaintiffs Mann, jointly and severally, in the amount of \$115,666.42;

B. Enter judgment in favor of Defendant Chico & Nunes and against Plaintiffs Joel K. Mann, d/b/a JKM Mundelein, LLC and WBK Financial Limited Partnership, jointly and severally, for post judgment interest at the applicable rate which shall begin to accrue upon entry of this judgment; and

C. Grant Defendant Chico & Nunes any other or additional relief that may be proper.

Respectfully submitted,

**CHICO & NUNES & NUNES, P.C.**

Date: September 21, 2010

By: /s/ Marcus J. Nunes

Marcus J. Nunes  
333 W. Wacker Drive  
Chicago, IL 60606  
Phone: 312.463.1000  
Fax: 312.463.1001  
*Attorney for Defendant*